

August 28, 2005

Upper Mississippi River NW&FR  
Attn: CCP Comment  
Room 101  
51 East Fourth St  
Winona MN 55987

2398

Dear Refuge Staff:

The Brice Prairie Conservation Association has as its mission the preservation of Lake Onalaska and the Black River bottoms. Much of our conservation work and support is for specific conservation projects to protect, enhance, and restore habitat on Pool 7 of the Mississippi River, the Black River delta, and lower Halfway Creek. In our 60 years as a conservation organization, we have had many successful conservation projects in our mission area. These have been successful not because they were mandated but because we worked in partnership with the three agencies responsible for the river – FWS, WDNR, and COE. We have enjoyed a particularly productive partnership with the La Crosse FWS District.

We do not understand the reliance of FWS on the regulatory approach of limiting and reducing public use, while not addressing primarily the real threats to the river and refuge – threats like invasive species.

As an active member of the La Crosse County Conservation Alliance, we endorse the adopted Alliance position that supports Alt. A with an amendment that implements pool-by-pool meetings with partner agencies and the public to design resource management actions to remedy problems and resolve issues.

We are pleased that FWS will be proceeding with the development of Alt. E after the Aug. 31 comment period. Our experience through our members' dedication to river conservation programs has firmly established our conservation philosophy of peer education and voluntary restraint for river use. We strongly encourage the primary thrust of FWS to embrace an educational and cooperative philosophy for river use management, combined with regulatory initiatives that are compatible with public understanding of their natural resource management purpose and need.

Influencing how the river is used through FWS access limitation or control, given the number and types of access to the river, will not be successful. Pursuing access limitation without partner agency agreement will no doubt endanger well-established strong public support for river conservation programs.

Regarding specific proposals for Pool 7 and the Black River bottoms, we do not support the proposed Black River delta electric motor area. We have dozens of productive woodduck houses as well as oak tree planting sites in this area. Electric motors only will severely restrict access for monitoring and maintenance. Our volunteers do not have electric motors.

We support the existing FWS waterfowl hunting program, including the state "no open water hunting" rule. Given the habitat restoration and enhancement challenges facing the river in the next several decades and the lack of state support for the proposed FWS waterfowl hunting rule changes such as 25 shell limit, 100 yard spacing, managed hunt, and fee structure, we urge the FWS to allocate scarce funding and personnel resources to habitat programs, not to waterfowl proposals that lack hunter support.

We strongly support the dog regulations that have been proposed and submitted by the La Crosse County Conservation Alliance.

We support allowing traditional camping on Lake Onalaska islands with an increased educational program focused on camping. This would be a great opportunity to strengthen peer education in concert with a more targeted FWS camping/sandbar education effort.

We strongly endorse a vegetation and predator management program on the three constructed islands that focus on using habitat management techniques through partner agencies such as WDNR to enhance and restore grassland habitat for ground nesting birds, particularly waterfowl. This is derived from recent history with waterfowl production on the islands and an understanding gained from waterfowl managers that many of the river mallards are produced in our region or migrate through here from nearby regions.

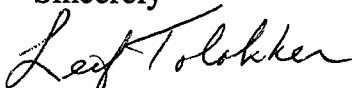
We are discouraged that preventing and controlling invasive species is not a primary priority of the CCP. We would assist in any way we could if the FWS were to lead the public and partner agencies in asking Congress and the President to enact controls on invasive species to prevent such species from entering the US and to seek funding for research and development of effective control methods for species such as Asian carp.

The commitment to river conservation of our members is strong and our experience with projects such as woodduck houses, oak tree propagation and planting, purple loosestrife control, two decades of river cleanup, funds donated for habitat projects with river agencies in particular FWS, volunteer time, funding, and active promotion of volunteer avoidance and restraint programs provides us with a strong basis for our recommendations and opinions.

We have always strongly supported sound natural resource programs and regulations, which are based on science and established natural resource management principles that agencies can fairly and effectively implement and enforce for public benefit.

We fear that a CCP as envisioned in Alt. D would become a significant deterrent to our organization in maintaining volunteers for conservation on the river.

Sincerely



Leif Tolokken  
President BPCA

CC: Rep. Kind  
Sen. Kapanke  
Rep. Huebsch  
Rep. Shilling  
DNR Sec. Scott Hassett